

REMARKS

In view of the preceding amendments and the following comments, and pursuant to 37 C.F.R. § 1.116, Assignee respectfully requests reconsideration of the Final Office Action.

Summary of Amendments

The Office Action provided grounds for the rejection of claims 1-12, 14, 16-27 and 29-31. Claims 1, 2, 9-11, 16-18, 20-21, and 27 were amended. Claims 13, 15, and 18 were previously canceled. Support for the amendments can be found at least in the originally filed claims, and ¶¶ 0078 and 0116. No new matter has been added.

The Assignee respectfully requests reconsideration of pending claims 1-12, 14, 16-27 and 29-31, and allowance of the present application in view of the amendments together with the following remarks.

Detailed Remarks

I. Rejections Under 35 U.S.C. § 101

The Office Action rejected claims 1-12, 14, 16-27 and 29-31, under 35 U.S.C. § 101 as being directed to non-statutory subject matter. Assignee respectfully disagrees, and submits that MPEP 2106, at page 2100-11, indicates that a claimed process is directed to statutory subject matter, under 35 U.S.C. § 101, where the process is tied to a particular machine or apparatus, or the process transforms a particular article into a different state or thing. Thus, in view of the amendments to claims 1, 2, 9-11, 16-18, 20-21, and 27, Assignee respectfully traverses these § 101 rejections.

Claim 1, as amended, recites a "computer-readable memory comprising: instructions executable by a processor coupled to the computer-readable memory." Claim 1 further recites "a data structure, wherein the instructions cause the processor to store the data structure in the computer-readable memory." In other words, the processor executes instructions that cause the processor to store the data structure in the computer-readable memory. Claim 1 also recites "the instructions cause the processor to construct the multiple concise account level decision queries using the

multiple concise account level decision relationships and execute the multiple concise account level decision queries to obtain multiple concise account level decision query results." In other words, claim 1 recites features that transform multiple concise account level decision relationships into multiple concise account level decision queries. Claim 1 clearly recites features that define structural and functional interrelationships between a data structure, multiple concise account level decision relationships, multiple concise account level decision queries, a processor and computer-readable memory. At least these features of claim 1 permit the functionality of the data structure to be realized, which includes obtaining multiple concise account level decision query results. Thus, claim 1 recites a process tied to a particular machine and the process transforms multiple concise account level decision relationships into multiple concise account level decision queries. Therefore, independent claim 1 and claims 2-12, 14, and 16-19, which depend from claim 1, are directed to statutory subject matter.

Claim 20, as amended, recites a "computer system for storing and processing account-related information by an application program comprising instructions executable by a processor coupled to one or more computer-readable memories." Claim 20 further recites "a data structure within the database, wherein the instructions executed by the processor establish the data structure." Claim 20 also recites "a data module within the database, wherein the instructions executed by the processor establish the data module." Claim 20 recites "the instructions cause the processor to construct the multiple concise account level decision queries using the multiple concise account level decision relationships and execute the multiple concise account level decision queries." Claim 20 clearly recites features that define structural and functional interrelationships between a data structure, a data module, multiple concise account level decision relationships, multiple concise account level decision queries, a processor and one or more computer-readable memories. At least these features of claim 20 permit the functionality of the data structure and data module to be realized. Thus, claim 20 recites a particular machine and a process that transforms multiple concise account level decision relationships into multiple concise account level decision queries.

Therefore, independent claim 20 and claims 22-26, which depend from claim 20, are directed to statutory subject matter.

Claim 21, as amended, recites a "method ... using instructions stored in at least one of the one or more computer-readable memories and executable by a processor coupled to the at least one of the one or more computer-readable memories." Claim 21 further recites "constructing multiple concise account level decision queries using the multiple concise account level decision relationships [and] executing the multiple concise account level decision queries." Claim 21 clearly recites features that define structural and functional interrelationships between a data structure, multiple concise account level decision relationships, multiple concise account level decision queries, a processor and one or more computer-readable memories. At least these features of claim 21 permit the functionality of the data structure to be realized. Thus, claim 21 recites a process tied to a particular machine and the process transforms multiple concise account level decision relationships into multiple concise account level decision queries. Therefore, independent claim 21 and claims 27 and 29-31, which depend from claim 21, are directed to statutory subject matter.

II. Rejections Under 35 U.S.C. § 103(a)

The Office Action rejected claims 1-12, 14, 16-20, and 22-26, under 35 U.S.C. §103(a) as being unpatentable over Dimitrios et al. (U.S. Patent No. 5,659,723) in view of Bosco et al. (U.S. Patent No. 5,191,522) and further in view of Guy et al. (U.S. Patent No. 6,993,510). The Office Action rejected claims 21, and 27-31, under 35 U.S.C. §103(a) as being unpatentable over Dimitrios, in view of Bosco, in view of Guy in further in view of Hele et al. (U.S. Patent Application Publication No. 2002/011835 A1).

Claims 1-12, 14, and 16-26

(i) Multiple different roles for a customer ID for an account ID

Independent claim 1, as amended, element (a)(iv), recites "a first account role for the first customer data object with respect to the first account ID [and] a third account role for the first customer data object with respect to the first account ID." Claim 1 further recites "multiple different roles for the customer identified by the first customer ID

with respect to the account ID identified by the first account ID." In other words, claim 1 clearly recites features that establish multiple different roles (e.g., a first account role and a third account role) for a customer identified by a customer ID (e.g., the first customer ID) with respect to a single account (e.g., the first account ID). The Office Action, at page 9, asserts that Dimitrios, in combination with Bosco and Guy, discloses multiple different roles for a customer identified by a first customer ID with respect to an account ID identified by a first account ID.

However, Dimitrios, alone or in any combination with Bosco and Guy, does not teach, suggest or disclose a first account role for the first customer data object with respect to the first account ID [and] a third account role for the first customer data object with respect to the first account ID, and multiple different roles for a customer identified by a first customer ID with respect to an account ID identified by a first account ID, as claimed. Instead, Dimitrios describes a method for automatically translating application program modeling data into computer application program model data. The Office Action, at page 11, concedes that Dimitrios does not disclose a first account role and third account role for a first customer with respect to a first account ID, and multiple different roles for a customer identified by a first customer ID with respect to an account ID identified by a first account ID, as claimed.

Bosco fails to fill the gap left by Dimitrios. The Office Action, at page 13, asserts that Bosco discloses "a first account role for the first customer data object with respect to first account ID." However, Bosco does not teach, suggest or disclose a first account role for a first customer data object with respect to a first account ID and a third account role for the first customer data object with respect to the first account ID, let alone multiple different roles for a customer identified by a first customer ID with respect to an account ID identified by a first account ID, as claimed. In other words, nowhere does Bosco teach, suggest or disclose multiple different roles for a customer ID for an account ID. Instead, Bosco is directed to a system for processing group insurance accounts. Bosco, at col. 14, ll. 61-64, indicates that each case "must be the account of one and only one client" and that each case is unique to a single client. Bosco, at col. 6, ll. 58-59, indicates that a case is an association of all the components of a plan of

insurance for a client. Bosco, at col. 17, ll. 42-43, indicates that each insured "must be covered by one and only one client." Bosco, at col. 10, ll. 25-34, indicates that the insured is a person (employee/member or dependent) and the insured entity provides descriptive information about individuals as participants (or dependents of participants) in a group insurance plan. Bosco describes roles that include a client, a participant (employee/member), and a dependent of a participant (a spouse or child). Bosco expressly mentions 'insured ID' twice in the entire specification at col. 10, ll. 36-39 and 49-51. Bosco, at col. 10, ll. 36-40, indicates that an insured role entity "associates a role type with an insured ID to record whether an insured plays the role of a participant, spouse, or child of the participant within a case." Thus, Bosco, alone or in any combination with Dimitrios, cannot be read to teach, suggest or disclose a first account role for the first customer data object with respect to the first account ID and a third account role for the first customer data object with respect to the first account ID, let alone multiple different roles for a customer identified by a first customer ID with respect to an account ID identified by a first account ID, as claimed.

Guy fails to fill the gap left by Dimitrios and Bosco. The Office Action, at page 15, asserts that Guy discloses "multiple different roles for a customer." However, Guy does not teach, suggest or disclose a first account role for the first customer data object with respect to the first account ID [and] a third account role for the first customer data object with respect to the first account ID, let alone multiple different roles for a customer identified by a first customer ID with respect to an account ID identified by a first account ID, as claimed. Instead, Guy is directed to a system and method for managing credit card accounts. Guy, at col.4, ll. 22-23 and 40-59, and Figure 2, discloses "assigning a 'role' to each cardholder," and "customer 210a ... has the primary role for account 220a ..., the only cardholder for account 210a, and thus there are no other roles for that account." Nowhere does Guy teach, suggest or disclose that the customer 210a has multiple different roles for an account (e.g., account 220a). Thus, Dimitrios, alone or in any combination with Bosco and Guy, cannot be read to teach, suggest or disclose each and every limitation of claim 1. Therefore, claim 1 and claims

2-12, 14, 16-19, which depend from claim 1, are patentable over the references taken alone or in any combination.

Independent claim 20, as amended, element (a)(i)(D), recites "a first account role for the first customer data object with respect to the first account ID [and] a third account role for the first customer data object with respect to the first account ID." Claim 20 further recites "multiple different roles for the customer identified by the first customer ID with respect to the account ID identified by the first account ID."

Independent claim 21, as amended, element (d), recites "a first account role for the first customer data object with respect to the first account ID [and] a third account role for the first customer data object with respect to the first account ID." Claim 21 further recites "multiple different roles for the customer identified by the first customer ID with respect to the account ID identified by the first account ID."

The foregoing remarks pertaining to the cited references and claim 1 are incorporated herein. For at least the same reasons as above regarding claim 1, claims 20 and 21, and the claims that depend from claims 20 and 21, are patentable over the cited references taken alone or in any combination.

(ii) An offering comprising a service and a product

Independent claim 1, element (a)(vi), recites an "offering entity class comprises a program entity class, wherein the program entity class establishes relationships between multiple service data objects and multiple product data objects." Claim 1, as amended, further recites "at least one of the multiple offering data objects defines an offering that comprises a service and a product." In other words, the features of claim 1 recite an offering that provides both a service and a product. The Application, at ¶ 0116, discloses a "three-tiered structure" that enables "the ability to combine products and services together to create programs that are tailored to an account." The Office Action, at pages 11-12, concedes that Dimitrios does not disclose these features of claim 1. The Office Action, at pages 13-14, asserts that Bosco discloses these features of claim 1.

However, Bosco does not disclose a program entity class that establishes relationships between multiple service data objects and multiple product data objects,

let alone an offering that comprises a service and a product, as claimed. Instead, Bosco, at col. 20, ll. 45-60, discloses "coverages and services that comprise a group product." Bosco, at col. 20, ll. 60-68, discloses "various Services that are group insurance business functions necessary to administer each product." Bosco does not teach, suggest or disclose that services are anything more than in support of insurance products offered to clients. Bosco, at col. 12, ll. 52-68, indicates that service is an insurance activity that enables a coverage to be administered according to the funding method specified for that coverage. Bosco, at col. 28, ll. 9-14, describes a product development program module that provides information necessary to enhance current products or to develop new products. Nowhere does Bosco express even the slightest notion of an offering that comprises a service and a product, as claimed.

Guy fails to fill the gap left by Dimitrios and Bosco. Nowhere does Guy, alone or in any combination with Dimitrios and Bosco, express even the slightest notion of an offering that comprises a service and a product. Thus, Dimitrios, alone or in any combination with Bosco and Guy, cannot be read to teach, suggest or disclose an offering that comprises a service and a product, as claimed. Therefore, claim 1 and claims 2-12, 14, 16-19, which depend from claim 1, are patentable over the references taken alone or in any combination.

Claim 20, as amended, element (a)(i)(F), recites "offering entity class comprises a program entity class, wherein the program entity class establishes relationships between multiple service data objects and multiple product data objects." Claim 20 further recites "at least one of the multiple offering data objects defines an offering that comprises a service and a product."

The foregoing remarks pertaining to the cited references and claim 1 are incorporated herein. For at least the same reasons as above regarding claim 1, claims 20, and the claims that depend from claims 20, are patentable over the cited references taken alone or in any combination.

Claims 21, 27, and 29-31

Claim 21 recites "the risk data objects define risk factors associated with addressing risks to customers and accounts, comprising: risk factors addressed by products; and risk factors addressed by services." The Application at ¶ 0100 indicates that "using a conventional two tier system, there would be no opportunity to view ... risks in the context of the business needs for the parent company [the customer]." In other words, the risk factors, as claimed, are from the perspective of the customer not the risks factors from the perspective of an institution that offers products and services to address the risks to the customer. The Office Action, at pages 24-25, asserts that Dimitrios, in combination with Bosco, Guy and Hele (the "Dimitrios-Bosco-Guy-Hele" combination) discloses all the features of claim 21.

However, the Dimitrios-Bosco-Guy-Hele combination does not teach, suggest or disclose the type of risk described by claim 21. The Office Action, at page 26, concedes that Dimitrios does not disclose "risk factors addressed by products; and risk factors addressed by services," as claimed. Bosco fails to fill the gap left by Dimitrios. Bosco does not express even the slightest notion of risk factors addressed by products and risk factors addressed by services. Nowhere does Guy express even the slightest notion of risk factors addressed by products; and risk factors addressed by services. Hele describes, at ¶¶ 0021 and 0047, querying a user about risk during an evaluation for life insurance coverage and collecting information from the user and any other sources. Hele indicates, at ¶ 0080, 0096, and 0122-0123, that underwriting is a determination of the risk associated with insuring a particular user. Hele at ¶ 0118 indicates that the user may represent an unacceptable risk based on their financial situation, physical build, medical conditions, or participation in risky activities. In other words, Hele may at best teach or suggest risks to an institution and the risk factors associated with insuring a customer by the institution. However, Hele cannot be read to teach, suggest or disclose risk factors addressed by products and risk factors addressed by services. In other words, the risk factors addressed by products and risk factors addressed by services for a customer are different from risk factors addressed by products that address risks for an institution offering the products to customers.

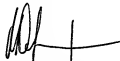
Even if the Dimitrios-Bosco-Guy-Hele combination were proper, the combination at best may teach or suggest products that address risk from the perspective of an institution offering those products to customers. Thus, Dimitrios, Bosco, Guy, and Hele, alone or in any combination, cannot be read to teach, suggest or disclose "risk factors addressed by products and risk factors addressed by services," as claimed. Therefore, claim 21 and claims 27 and 29-31, which depend from claim 21, are also patentable over the references taken alone or in any combination.

Conclusion

With this response, the present pending claims of this application are allowable, and Assignee respectfully requests the Examiner to issue a Notice of Allowance for this application. Should the Examiner deem a telephone conference to be beneficial in expediting allowance/examination of this application, the Examiner is invited to call the undersigned attorney at the telephone number listed below.

BRINKS
HOFFER
GILSON
& LIONE

Respectfully submitted,



Robert D. Summers Jr.
Registration No. 57,844
Attorney for Assignee

BRINKS HOFER GILSON & LIONE

CUSTOMER NO. 28164

Telephone: (312) 321-4200

Facsimile: (312) 321-4299